



**UNITED STATES DEPARTMENT OF COMMERCE**  
National Oceanic and Atmospheric Administration  
NATIONAL OCEANIC SERVICE  
**Office of National Marine Sanctuaries**  
1305 East-West Highway  
Silver Spring, Maryland 20910

Dr. Daniel Pondella, Director  
Southern California Marine Institute  
820 South Seaside Ave.  
Terminal Island, CA 90731

**MAR 12 2018**

Subject: Decision Regarding Nomination for Southern California Offshore Banks National Marine Sanctuary

Dear Dr. Pondella:

Thank you for your nomination last year of the Southern California Offshore Banks National Marine Sanctuary. In reviewing your nomination in accordance with the final rule *Re-Establishing the Sanctuary Nomination Process* (79 FR 33851), the National Oceanic and Atmospheric Administration's (NOAA) Office of National Marine Sanctuaries (ONMS) found the nomination complete on February 8, 2017. We have now completed our review of the nomination against the 11 review criteria (four national significance criteria and seven management considerations) identified in the final rule. The nomination clearly demonstrated the ecological significance of these unique offshore banks, the research potential the banks offer science and the threats that they face. Despite these strengths of the nominated area, ONMS has determined that the nomination does not adequately meet NOAA-established criteria to warrant adding this area to the inventory of sites that could be considered in the future for designation as a national marine sanctuary.

Our primary concern about the nomination as submitted was that it did not adequately meet the requirements for management consideration #7, which indicates a national marine sanctuary nomination must demonstrate support for the national marine sanctuary concept from a breadth of community interests. In our final rule, we define a community as individuals or locally-based groups (e.g., "friends of" group, chamber of commerce); tribal, local, state, or national agencies; elected officials; or topic-based stakeholder groups, at the local, regional or national level (e.g., a local chapter of an environmental organization, a regionally-based fishing group, a national-level recreation or tourism organization, academia or science-based group, or an industry association). We acknowledge that a proposed sanctuary far offshore and remote from a coastline such as the Southern California Offshore Banks can have a more difficult time demonstrating support from some of the groups identified in the final rule for this criterion. Nonetheless, given that "users" of the nominated area exist – such as surfers, divers and the U.S. Navy, along with researchers (which you did adequately represent) – a nomination adequately meeting this criterion should include more of these groups. We also felt the nomination would have benefitted from support from the myriad ocean conservation organizations and marine educational institutions along the southern California coast.

Please know that when ONMS considers this aspect of a nomination, we are looking for representative support from a diverse cross section of the community. We are not, however, looking for unanimous support at this time from those that may use or be interested in these offshore banks.

Should you be interested in re-submitting this nomination, staff from our West Coast Regional Office are prepared to assist you and answer any follow up questions you may have. It would be particularly important for you to work closely with the U.S. Navy to address any concerns they may have. We are happy to discuss other ways the overall nomination could be strengthened as well.

Thank you again for your interest in NOAA's national marine sanctuaries and for taking the time to submit the nomination for this important area.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Armor", is written over the typed name and title. The signature is stylized and cursive.

John Armor  
Director

cc: Vicki Wedell, Acting Chief, ONMS Policy and Planning Division  
William J. Douros, Regional Director, ONMS West Coast Region